

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Glencore, McAllister Towing & Transportation, Inc.
and Moran Towing Corporation

In Re:

HANJIN SHIPPING CO., LTD.,

Debtor.

Case No.: 16-27041 JKS

Honorable John K. Sherwood

Chapter: 15

NOTICE OF MOTION FOR AN ORDER FOR RECONSIDERATION

TO: Office of the U.S. Trustee
One Newark Center
Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE, that on the date and time set forth in the Order Shortening Time transmitted herewith, the undersigned, as counsel for OceanConnect Marine, Inc., Glencore, McAllister Towing & Transportation, Inc. and Moran Towing Corporation, ("Maritime Lien Holders"), shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Fl., P.O. Box 1352, Newark, New Jersey 07102, seeking the entry of an Order for Reconsideration, together with such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the Motion

filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is requested.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the relief requested does not involve any novel or complex issues of law.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, P.O. Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be served upon Wasserman, Jurista & Stolz, P.C., Attn: Donald W. Clarke, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920 so as to be filed and received as set forth in the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

WASSERMAN, JURISTA & STOLZ, P.C.
Attorneys for OceanConnect Marine, Inc., Glencore,
McAllister Towing & Transportation, Inc. and Moran
Towing Corporation

Date: September 9, 2016

/s/ DANIEL M. STOLZ
DANIEL M. STOLZ